

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

Date: January 4, 1994

FAX TO: PSAPCA
Attention: Jay Willenberg
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No. of pages including cover 3

Mr. Willenberg,

The January 3, 1995 draft of NOC #5730 looks fine with the following minor corrections:

- Item 8. - Spelling: Ash Grove
 - opacity mentioned twice, suggest deleting "opacity emission"
- Item 9. - Spelling: Ash Grove
 - To address the specific issue, the first sentence should read:
....for controlling fugitive emissions from
the clinker discharge end of the kiln.

The attached reflects these corrections and is acceptable to Ash Grove.

Thank you

AGCS2M002188

ASH GROVE NOC #5730

This Order of Approval #5730 supersedes Order of Approval #3382 and adds the installation of a 120 ton/hour Clinker Pre-Grind Crusher with a Baghouse at 20,000 cfm, and a Finish Mill High Efficiency Separator Project including (2) 60 ton/hr High Efficiency Separators with (2) Baghouses at 77,000 cfm each, (2) Baghouses at 10,000 cfm each, and a Baghouse at 5,000 cfm.

Notice of Construction Special Conditions:

4. This source is subject to Subpart F of 40 CFR PART 60.
5. PM-10 emissions from each baghouse except the Main Stack baghouse shall not exceed 0.005 grains/dscf over a twenty-four hour period. Ash Grove may demonstrate compliance with this condition by any of the following:
 - A. Performing a PSAPCA approved source test according to EPA Method 5 or EPA Method 201A,
 - B. Demonstrating no visible emissions for 15 consecutive seconds,
 - C. Demonstrating no visible emissions for three consecutive minutes, or
 - D. Repairing within 24 hours, any baghouse that has visible emissions for more than three consecutive minutes.

Compliance shall be determined for visible emissions using EPA Method 22. PSAPCA may require a source test for any baghouse that has sustained visible emissions, unless such emissions are considered unavoidable under WAC 173-400-107.

6. Except during start-up and shutdown of the kiln, scheduled maintenance and for emissions considered unavoidable under WAC 173-400-107, emissions from the main baghouse shall not exceed the most stringent of PSD limits or the following limits:
 - A. Carbon Monoxide (CO): 1049 ppm @ 10% oxygen (O₂), 8-hr ave., and 2353 tpy (tons per year);
 - B. Nitrogen Oxides (NO_x): 700 ppm @ 10% O₂ 1-hr ave., 501 ppm @ 10% O₂ 24-hr, and 1846 tpy;
 - C. Sulfur Dioxide (SO₂): 180 ppm @ 10% O₂ 1-hr ave., and 176 tpy;
 - D. Particulate Matter (PM): 10.6 pph and 46 tpy.

7. During start-up and shutdown of the kiln, and during scheduled maintenance on the main baghouse, all of the emission limits stated in condition 6 apply, except that emissions from the main stack shall not exceed 200 ppm of SO₂ corrected to 10% O₂ for a one hour average and 1000 ppm of NO_x corrected to 10% O₂ for a one hour average. Appendix A to this order defines the start-up, shutdown and scheduled maintenance conditions under which these alternate limits apply.
8. Ash Grove shall monitor and report CO, NO_x, SO₂, and opacity from the main baghouse according to Article 12 of Regulation 1.
9. By May 1, 1995, Ash Grove shall submit to PSAPCA for approval a best available control technology determination for controlling fugitive emissions from the clinker discharge end of the kiln. The evaluation must include start-up and shutdown.
10. Ash Grove shall submit a testing plan to PSAPCA for approval within 60 days of startup for testing of the High Efficiency Separator Baghouse.
11. This Order of Approval supersedes and cancels Order of Approval No. 3382 dated June 19, 1990.